



November 15, 2010

**RE: United States Environmental Protection Agency, Region IX
Follow Up Request for Information Pursuant to 42 U.S.C. § 9604(e)
Pertaining to the Yosemite Creek Superfund Removal Site**

VIA EMAIL and FEDERAL EXPRESS

Craig Whitenack, Civil Investigator
United States Environmental Protection Agency
Region IX, Southern California Field Office
600 Wilshire Boulevard, Suite 1420
Los Angeles, California 90017

Dear Mr. Whitenack:

On behalf of Intel Corporation ("Intel"), this letter responds to the August 24, 2010 U.S. Environmental Protection Agency ("EPA") "Follow Up Request for Information Pursuant to 42 U.S.C. § 9604(e) Pertaining to the Yosemite Creek Superfund Removal Site" ("FRFI"). In the FRFI, USEPA acknowledged receipt of Intel's January 11, 2010 response to the original RFI, but considered the response to be non-responsive or only partially responsive to the RFI.

Intel strongly disagrees. Intel's original response to the RFI adequately responded to the RFI. Intel also notes that the FRFI provided no explanation or details as to why USEPA considered the response to be insufficient. However, based on the request in the FRFI for an additional written response, Intel is providing additional information in this submittal to further clarify that Intel has no records or any knowledge of transporting any drums or causing drums to be transported to the Bay Area Drum Company (BADC).

Further, the drum total allocated to Intel during the BADC remediation was not based on any information provided by Intel. Intel's decision to settle its potential liability for the BADC site via a Buy-Out Agreement with the BADC PRP Group was based on resolving the matter efficiently; however, Intel has serious questions whether Intel should have been a PRP for the BADC site.

Intel Historical Operations

The following table summarizes Intel's facilities where manufacturing operations were conducted in California between 1968 (year founded) and 1988. It does not include other non-manufacturing locations during the Relevant Time Period (e.g. offices and storage facilities that would not have generated SOIs).

Manufacturing Sites Between 1968* & 1988				Active	Inactive
	Mt. View 1 Plant	365 Middlefield Rd	Mt View	18-Jul-68	30-Dec-81
	Bowers Campus	3065 Bowers Ave	Santa Clara	1-Jan-71	still active
	Fab 3 (Livermore 1)	250 N Mines Rd	Livermore	1-Apr-73	31-Dec-95
	Santa Clara 3	2880 Northwestern Parkway	Santa Clara	1-Jan-76	18-Sep-09
	Magnetics	Oakmead Village Court, Kifer Rd	Mountain View	1-Jan-78	30-Dec-85
	Fab 1a (SC7)	3601 Juliette Ave	Santa Clara	1-Jan-82	still active

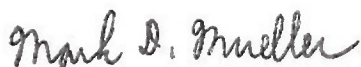
*Intel founded in this year

Substances of Interest (SOIs) and Contaminants of Concern (COCs)

Based on a thorough records review and numerous interviews with employees, Intel believes that none of the COCs were used in Intel's manufacturing processes at the facilities identified above during the Relevant Time Period. Employee interviews also revealed that all PCB transformer oils were removed and replaced by a qualified third party (e.g., Westinghouse, now Cutler Hammer). Various hydraulic oils were used in small quantities during the Relevant Period, but interviews with employees identified that these hydraulic oils would likely not have contained any SOI. Specific records regarding the management of the transformer and hydraulic oils could not be found.

The information in this letter is provided notwithstanding Intel's objections to EPA's original RFI and without waiver of any of Intel's objections that were provided in Intel's January 11, 2010 response to EPA's original RFI.

Sincerely,



Mark D. Mueller
Senior EHS Corporate Attorney
Intel Corporation
Phone: (480) 715-2448
mark.d.mueller@intel.com

cc (email only): Michael Massey, Esq. (U.S. EPA)
Tom Cooper (Intel)
Edward L. Strohhahn Jr. (Bingham McCutchen LLP)